

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

SYNCA DIRECT, INC.,

Plaintiff and Counterclaim-
Defendant,

~against~

MULTIMEDIA DENTAL SYSTEMS, INC.,

Defendant and Counterclaim-
Plaintiff,

~against~

SYNCA, and JOHN DOES 1-5,

Additional Counterclaim-
Defendants.

**DECLARATION OF
WILLIAM L. OWENS**

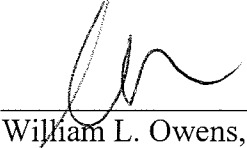
Index No.: 06-CV-1263
LEK/DRH

I, **William L. Owens**, hereby declare as follows:

1. I am a partner in the firm of Stafford, Owens, Curtin & Trombley, PLLC and the Attorney assigned this matter.
2. I have reviewed the filings by MMD and the Affidavit of Mr. Monnette in this matter. We recognize that the testimony of Mr. de Tracy and Mr. Vannoye are critical to this case; however, the limited time in which the Plaintiff had to respond to this application for temporary relief leaves it in the position in where it must request, if the court grants the temporary relief, that the Plaintiff be allowed to reopen this hearing based upon submission of those affidavits and/or deposition testimony as well as a Memorandum of Law in the future is critical.

DATED: January 16, 2007

STAFFORD, OWENS, CURTIN
& TROMBLEY, PLLC



William L. Owens, Esq.
One Cumberland Avenue
P.O. Box 2947
Plattsburgh, New York 12901
(518) 561-4400